REMARKS

The Office Action of October 19, 2006, has been reviewed and these remarks are responsive thereto. Claims 1, 13-15, 17, 19-21, 24-27 and 34-39 remain pending in this application. Reconsideration and allowance of the instant application are respectfully requested.

Rejections Under 35 U.S.C. § 102

Claims 1, 13-15, 17, 19, 20, 24-27 and 34-36 stand rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 6,493,464 to Hawkins et al. ("Hawkins"). Applicants respectfully traverse this rejection.

Independent claim 1 recites, among other features, a method, in a computer, comprising the steps of:

> receiving user input identifying a symbol, a text expansion, and a program; associating the text expansion and the program with the symbol; receiving handwritten user input; determining whether the handwritten user input represents the symbol; determining a context in which the handwritten user input is written; choosing between either the text expansion or the program depending upon the determined context; and either displaying the text expansion or launching the program depending upon the outcome of the choosing step.

Hawkins fails to teach or suggest all the features of claim 1. Hawkins describes a pen-based text input system capable of interpreting a special, pre-defined set of single stroke glyphs. Abstract. Hawkins describes a system wherein user input is identified as a pre-determined glyph. Col. 7 lines, 26-43. The glyph is then interpreted according to a dictionary that is consulted and, depending on the type of stroke input, an output is provided in response to a stroke that matches the defined glyph. Col. 7, lines 44-54.

Hawkins fails to teach or suggest associating a text expansion and a program with a symbol. The Office Action cites column 12, lines 2-11 and asserts that a user-maintained glossary could be built where the user could define sequences of characters – or symbols, text or

program functions – to be associated with a stroke. While Hawkins describes associating a stroke with "character(s), symbol(s), text, or program functions," (col. 12, lines 58-60) Hawkins nevertheless fails to teach or suggest associating the user input with two different expansions: both a text expansion *and* a program. At most, Figures 4A and 4B of Hawkins illustrate that a user input may be associated with more than one character – which is consistent with the reference to "character(s)" in col., 12, lines 58-60. Thus, Hawkins allows the same stroke to be associated with different types of the same expansion – i.e., different characters. However, the Office Action attempts to over-extend beyond what is actually disclosed by Hawkins, asserting that Hawkins also associates a stroke with multiple different types of expansions. This is not so; there is simply no teaching or suggestion in Hawkins for such a concept. Indeed, Hawkins describes such different associations as alternatives: "characters(s), symbol(s), text, *or* program functions." (col, 12, lines 58-60) (italics added).

Accordingly, Hawkins fails to teach or suggest associating a symbol with both a text expansion and a program, as recited in claim 1. For the same reasons, Hawkins also necessarily fails to teach or suggest choosing between either the text expansion or the program depending upon the determined context, as further recited in claim 1.

For at least the reasons cited above, Applicants respectfully assert that claim 1 is allowable. Dependent claims 13 and 37, that depend from claim 1, are allowable for at least the same reasons discussed above and further in view of the novel features recited therein. Accordingly, Applicants respectfully request withdrawal of these rejections.

Independent claim 14 includes language similar to claim 1 and recites, among other features, a method comprising the steps of "...receiving first handwritten user input including at least first handwritten user input, the first handwritten input being associated with both expanded text and a program." As discussed above, Hawkins fails to teach or suggest associating a first user input with *both* expanded text and a program. Accordingly, Applicants respectfully assert that claim 14 is allowable.

Dependent claims 15, 17, 19-21, 24-26 and 35 depend from claim 14 and are allowable for at least the same reasons as recited above and further in view of the novel features recited therein. Accordingly, Applicants respectfully request withdrawal of these rejections.

Independent claim 27 recites, "recognizing the handwritten user input to determine a symbol; determining expanded text represented by the symbol; determining a program represented by the symbol." For similar reasons as discussed above, since Hawkins does not associate a stroke with both a character and a program, Hawkins necessarily fails to teach or suggest determining expanded text represented by the symbol *and* determining a program represented by that symbol. Accordingly, Applicants respectfully assert that claim 27, as well as claims 34, 36, 38 and 39 that depend therefrom, are allowable.

Rejections Under 35 U.S.C. § 103

Claims 21 and 37-39 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Hawkins. Claims 21, 37, and 38-39 depend from claims 14, 1 and 27, respectively, and are therefore allowable for at least the same reasons as their base claims and further in view of the novel features recited therein.

For instance, claim 37, which depends from claim 1, recites "determining a number of words in the handwritten user input and displaying the expanded text if the number of words in the handwritten user input is greater than one, and launching the program if the number of words in the handwritten user input is equal to one." The Office Action asserts that Figure 5A of Hawkins illustrates typical end of word indicators, such as "space," and that such end of word indicators would allow a determination to be made as to whether the word count was equal to one. Respectfully, at best this implies that Hawkins is capable of determining when a handwritten word has ended. However, further asserting that Hawkins is therefore capable of determining the number of words in a user input and performing a particular action depending

upon that determination, i.e., displaying the expanded text if the number of words is greater than one and launching a program if the number of words is equal to one, is without support.

In any event, the Office Action's assertion that an alleged prior art system is *capable of* performing a function is irrelevant to the question of obviousness. Any computer can, in theory, be programmed to perform any function. This does not mean that all computer-related inventions are therefore obvious over existing computers.

Moreover, the alleged motivation for modifying Hawkins is totally unrelated to the proposed modification. The Office Action alleges that it would have been obvious "to use a non-printing character symbol to indicate the user had entered a complete word in order to allow the system to be used for word processing functions." Office Action, p. 9. Even assuming this as true merely for the sake of argument, this does not address why Hawkins would take that information about where words begin and end and determine the number of words, and then from the number of words perform one of two claimed functions – (a) displaying the expanded text if the number of words in the handwritten user input is greater than one, or (b) launching the program if the number of words in the handwritten user input is equal to one. To the contrary, at best the Office Action's proposal would result in the system of Hawkins merely being able to determine the beginning and ending of each word, but not to perform the claimed functions resulting from a count of the number of words.

For at least these additional reasons, Applicants respectfully assert that claim 37 is allowable.

Claim 39, which depends from claim 27, includes language similar to that of claim 37 and is allowable for at least the same reasons recited above and further in view of the novel features recited therein.

Claim 38 depends from claim 27 and is allowable for at least the same reasons discussed with respect to claim 27. Claim 27, recites, among other features, "…either displaying the

expanded text or launching the program depending upon a context of the handwritten user input." Claim 38 adds the additional feature, "wherein the context includes a number of words in the handwritten user input." While Hawkins does describe symbols that may be used to indicate the end of a word, Hawkins fails to teach or suggest determining a number of words in the input and displaying expanded text or launching a program based on that number of words. Again, merely proposing that Hawkins is capable of counting words, is totally disconnected with what is done with that count as required by claims 27 and 38 – that the context, upon which either expanded text is displayed or a program is launched, includes the number of words. Accordingly, Applicants respectfully assert that claim 38 is allowable for these further reasons.

Conclusion

All rejections having been addressed, it is believed that the present application is in condition for allowance, and notice to that effect is respectfully requested. Should the Examiner have any questions, the Examiner is invited to contact the undersigned at the number below.

Respectfully submitted,

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